

*Exhibit S*

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
BILLINGS DIVISION

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TRACY CAEKAERT, and  
CAMILLIA MAPLEY,

Case No.  
CV-20-52-BLG-SPW

Plaintiffs,

vs.

WATCHTOWER BIBLE AND  
TRACT SOCIETY OF  
NEW YORK, INC., et al,

Defendants,

WATCHTOWER BIBLE AND  
TRACT SOCIETY OF  
NEW YORK, INC., et al,

VIDEO-RECORDED  
DEPOSITION UPON ORAL  
EXAMINATION OF THOMAS  
MEYERS

Cross Claimants,

vs.

BRUCE MAPLEY, SR.,

Cross Defendant.

ARIANE ROWLAND, and  
JAMIE SCHULZE,

Plaintiff,

Cause No.  
CV 20-59-BLG-SPW

vs.

WATCHTOWER BIBLE AND  
TRACT SOCIETY OF  
NEW YORK, INC., et al,

Defendants.

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**Thomas Meyers**

1 ministerial servant could sit on?

2 A. Not that I've ever heard of.

3 Q. All right. And what I'm asking, I guess,  
4 is how -- how would you know that, say, Elders can  
5 be on a judicial committee but ministerial servants  
6 should not? Or would that be up to you guys in  
7 Hardin?

8 A. No. That's -- that's -- that's  
9 organizational information, yeah.

10 Q. And when you say, "organizational," what  
11 do you mean by that?

12 A. It's something set by the Watchtower  
13 organization, the brothers back at the service  
14 department, for example.

15 Q. And how would that information be conveyed  
16 to you as an Elder when you're an Elder?

17 A. It's in print. We -- we receive letters,  
18 not a whole lot of them, but periodic ones,  
19 especially if something is changed.

20 There's also an Elder, like, handbook, if  
21 you will, that gets updated periodically.

22 Q. All right. And is there more than one  
23 Elder handbook? I've seen a few that look like --

24 A. It's just evolved over time.

25 Q. And what do you call it? Do you call it

**Thomas Meyers**

1 an Elder handbook, or do you have another name for  
2 it?

3 A. Currently it's called the shepherding  
4 book.

5 Q. And -- Shepherd the Flock, or is that a  
6 different --

7 A. Something like that, yeah. It changes.  
8 My memory's not good.

9 Q. But it sounds like, regardless, it was --  
10 those directions were in print and that they came  
11 from what you described as the Watchtower Society.  
12 Is that --

13 A. That's correct.

14 Q. The service department was your  
15 understanding? Is that --

16 A. Right. Yes.

17 Q. Did you ever have input on those policies  
18 when you were an Elder?

19 A. No. I don't know what you mean, I guess.

20 Q. Did you -- when you were an Elder, did you  
21 ever give input to the circuit overseer about what  
22 should be included in the manuals?

23 A. I don't recall ever doing it. I don't --  
24 may -- might have expressed my opinion here and  
25 there, but not -- nothing that I can remember.

**Thomas Meyers**

1 Q. Other than the manuals that -- that you  
2 described, that the names have changed, were there  
3 other places that you -- when you were an Elder,  
4 that you got directions about how to perform your  
5 duties as an Elder?

6 A. No. It was always in print.

7 Q. So you didn't have to look anywhere else  
8 other than those periodicals and the printed  
9 materials that laid out the directions for being an  
10 Elder?

11 A. Yes.

12 Q. And would those materials that you're  
13 describing, would each Elder have a copy sent to  
14 them, or would there be, like, one reference, or  
15 did it vary?

16 A. We would each have our own copy, yeah.

17 Q. All right.

18 A. Currently, it's all digital, so that  
19 simplifies everybody having a copy.

20 Q. For sure.

21 A. Yeah.

22 Q. When did that change happen? Do you  
23 remember at all?

24 A. No, I don't remember. I know -- I feel  
25 like I'm left in the dust, you know, on that one.

**Thomas Meyers**

1 of wanted to -- where it says, "Please see The  
2 Watchtower of March 15th, 1983, page 29," do you  
3 see that?

4 A. Yeah, I see that.

5 Q. I'm not asking you to recall what that is,  
6 but what I'm asking is what -- or you previously  
7 described that when you're an Elder, the  
8 publications would tell you, you know, how to do  
9 things and what to do.

10 A. Right.

11 Q. Would this be the kind of description that  
12 you would see in those publications where it would  
13 refer you to a place to answer a specific question?

14 A. I believe so, yeah. That's a good way to  
15 put it.

16 Q. Let's go to the second page of [Exhibit 11](#).  
17 And just start up at the top there. Underneath  
18 where it says, "Name of congregation, Hardin,"  
19 there's a box. Do you see that?

20 A. Yes.

21 Q. And it says, "The governing body has  
22 approved the recommendations on the reverse side as  
23 indicated by the Watchtower Society stamp below.  
24 The date stamp below constitutes the date of  
25 appointment."

**Thomas Meyers**

1           And so in that box, where it says, "The  
2 governing body has approved the recommendations,"  
3 what's your understanding of what the governing  
4 body's role was there?

5           A.     Apparently they review this -- and, well,  
6 there is something here about what you read earlier  
7 that maybe they'd have -- would draw them to ask  
8 more questions, perhaps. I don't know. But on  
9 this form it didn't look like there was any  
10 questions that they came up with, so they approved  
11 it.

12          Q.     And is it your understanding that the  
13 governing body is the one who approves the  
14 appointment of others?

15          A.     I suppose so.

16          Q.     And I understand that that's what this  
17 says, but I'm asking for was that -- is that your  
18 understanding?

19          A.     I don't know personally if they read this  
20 themselves. I don't know. I have no idea. But  
21 they obviously take responsibility for putting a  
22 stamp on it.

23          Q.     And so when you say "they" --

24          A.     The governing body, I was referring to.

25          Q.     And -- okay. And so the -- do you

**Thomas Meyers**

1     how to go about this?

2           A.     Well, because the -- the -- I don't know,  
3     call it a crime, you know, because of the stuff  
4     that happened, was kind of old, you know. It was  
5     decades old. We needed to get some direction,  
6     because the direction we had basically was, you  
7     know, if this happened in recent -- last couple,  
8     three years, you know, we're talking a couple,  
9     three decades, so we needed to get some kind of  
10    information what to do about it.

11          Q.     And were you ever trained how to talk to  
12    victims of -- child victims of sexual abuse?

13          A.     In general terms, yeah.

14          Q.     By whom?

15          A.     We'd go to these Elder schools. There's  
16    things in The Watchtower and Awake! too on that.

17          Q.     So you turned to The Watchtower and Awake!  
18    and go to some conferences?

19          A.     Yeah.

20          Q.     And what did you -- what did you learn  
21    specifically?

22          A.     To not do all the talking.

23          Q.     Did you learn the process of taking  
24    interviews and talking to victims of abuse?

25          A.     Try to draw them out, get the facts, and

130